

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JOHN FELDER,	:	VIOLATIONS:
 a/k/a "Bo,"	:	21 U.S.C. § 841(a)(1) (distribution of and
GREGORY LONG,	:	possession with intent to distribute
 a/k/a "Tyrone Brown,"	:	cocaine base ("crack") - 11 counts)
THEARTIS LEON HAYNES	:	21 U.S.C. § 841(a)(1) (distribution of and
	:	possession with intent to distribute
	:	marijuana - 3 counts)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute cocaine - 1 count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute heroin - 1 count)
	:	18 U.S.C. § 924(c) (possession of firearm
	:	in furtherance of drug trafficking
	:	- 2 counts)
	:	18 U.S.C. §§ 922(g)(1) and 924(e)
	:	(convicted felon in possession of a firearm
	:	- 2 counts)
	:	18 U.S.C. § 2 (aiding and abetting - 8
	:	counts)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about April 15, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

GREGORY LONG,
a/k/a "Tyrone Brown,"

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately

1.076 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 3, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**GREGORY LONG,
a/k/a “Tyrone Brown,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately
531 milligrams of a mixture and substance containing a detectable amount of cocaine base
(“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and
Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 4, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**GREGORY LONG,
a/k/a “Tyrone Brown,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately
510 milligrams of a mixture and substance containing a detectable amount of cocaine base
 (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and
Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 13, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JOHN FELDER,
a/k/a “Bo,” and
GREGORY LONG,
a/k/a “Tyrone Brown,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately
2.734 grams of a mixture and substance containing a detectable amount of cocaine base
(“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and
Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 13, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JOHN FELDER,
a/k/a “Bo,” and
GREGORY LONG,
a/k/a “Tyrone Brown,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately
5.39 grams of a mixture and substance containing a detectable amount of marijuana, a Schedule I
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D), and
Title 18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 20, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JOHN FELDER,
a/k/a “Bo,” and
GREGORY LONG,
a/k/a “Tyrone Brown,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 5.307 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 20, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JOHN FELDER,
a/k/a “Bo,” and
GREGORY LONG,
a/k/a “Tyrone Brown,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately
5.98 grams of a mixture and substance containing a detectable amount of marijuana, a Schedule I
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D), and
Title 18, United States Code, Section 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 31, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JOHN FELDER,
a/k/a “Bo,” and
GREGORY LONG,
a/k/a “Tyrone Brown,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately
2.935 grams of a mixture and substance containing a detectable amount of cocaine base
 (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and
Title 18, United States Code, Section 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 1, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**THEARTIS HAYNES,
JOHN FELDER,
a/k/a “Bo,”
GREGORY LONG,
a/k/a “Tyrone Brown,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 11.19 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 8, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOHN FELDER,
a/k/a “Bo,” and
GREGORY LONG,
a/k/a “Tyrone Brown,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately
4.727 grams of a mixture and substance containing a detectable amount of cocaine base
(“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and
Title 18, United States Code, Section 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 10, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**THEARTIS HAYNES and
JOHN FELDER,
a/k/a “Bo,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 50 grams or more, that is, approximately 67 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 10, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JOHN FELDER,
a/k/a “Bo,”**

knowingly and intentionally possessed with the intent to distribute 5 grams or more, that is,
approximately 6.175 grams, of a mixture and substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 10, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JOHN FELDER,
a/k/a “Bo,”**

knowingly and intentionally possessed with the intent to distribute approximately 1,048 grams of
a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 10, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JOHN FELDER,
a/k/a “Bo,”**

knowingly and intentionally possessed with the intent to distribute approximately 6.540 grams of
a mixture and substance containing a detectable amount of heroin, a Schedule I controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 10, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

THEARTIS HAYNES

knowingly and intentionally possessed with the intent to distribute 5 grams or more, that is,
approximately 19.266 grams, of a mixture and substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 10, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

THEARTIS HAYNES

knowingly and intentionally possessed with the intent to distribute approximately 112 grams of a
mixture and substance containing a detectable amount of cocaine, a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 10, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JOHN FELDER,
a/k/a “Bo,”**

knowingly possessed a firearm and ammunition, that is, a Tanfoglio, Armi Guiseppe, Model
GT- 27, .25 caliber semiautomatic pistol, serial number M99572, loaded with 7 live rounds of
ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court
of the United States, that is, distribution of, and possession with the intent to distribute, a
controlled substance in violation of Title 21, United States Code, Section 841(a)(1), and Title 18,
United States Code, Section 2.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 10, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JOHN FELDER,
a/k/a “Bo,”**

knowingly possessed a firearm and ammunition, that is, a Glock, Model 17, 9 millimeter semiautomatic pistol, serial number defaced, loaded with 18 rounds of live ammunition, and a Colt, Model “Official Police,” .38 caliber revolver, serial number defaced, loaded with 6 rounds of live ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, distribution of, and possession with the intent to distribute, a controlled substance in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 10, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JOHN FELDER,
a/k/a “Bo,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Tanfoglio, Armi Guiseppe, Model GT- 27, .25 caliber semiautomatic pistol, serial number M99572, loaded with 7 live rounds of ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 10, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JOHN FELDER,
a/k/a “Bo,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Glock, Model 17, 9 millimeter semiautomatic pistol, serial number defaced, loaded with 18 rounds of live ammunition, and a Colt, Model “Official Police,” .38 caliber revolver, serial number defaced, loaded with 6 rounds of live ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Section 841(a)(1), set forth in this indictment, defendants

**JOHN FELDER,
a/k/a “Bo,”
THEARTIS HAYNES, and
GREGORY LONG,
a/k/a “Tyrone Brown,”**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including, but not limited to:

(1) approximately \$1,502.00 in United States currency recovered from the residence at 1741 Sigel Street, Philadelphia, Pennsylvania;

(2) approximately \$5,100.00 in United States currency recovered from the residence at 1741 Sigel Street, Philadelphia, Pennsylvania;

(3) approximately \$132 recovered from the person of Theartis Haynes on June 10, 2005;

(4) approximately \$180 in United States currency which was pre-recorded buy money used in the purchase of cocaine base (“crack”) from Gregory Long on April 15, 2005;

(5) approximately \$50 in United States currency which was pre-recorded buy money used in the purchase of cocaine base (“crack”) from Gregory Long on May 3, 2005;

(6) approximately \$60 in United States currency which was pre-

recorded buy money used in the purchase of cocaine base (“crack”) from Gregory Long on May 4, 2005;

(7) approximately \$170 in United States currency which was pre-recorded buy money used in the purchase of cocaine base (“crack”) from Gregory Long and John Felder on May 13, 2005;

(8) approximately \$350 in United States currency which was pre-recorded buy money used in the purchase of cocaine base (“crack”) and marijuana from Gregory Long and John Felder on May 20, 2005;

(9) approximately \$500 in United States currency which was pre-recorded buy money used in the purchase of cocaine base (“crack”) from Gregory Long, John Felder and Theartis Haynes on June 1, 2005;

(10) approximately \$250 in United States currency which was pre-recorded buy money used in the purchase of cocaine base (“crack”) from Gregory Long and John Felder on June 8, 2005;

(11) approximately \$3,000 in United States currency which was pre-recorded buy money used in the purchase of cocaine base (“crack”) from Theartis Haynes and John Felder on June 10, 2005;

(12) approximately \$40 in United States currency which was pre-recorded buy money used in the purchase of marijuana from John Felder on June 10, 2005;

(13) a Tanfolglio, Armi Guiseppe, Model GT- 27, .25 caliber semiautomatic pistol, serial number M99572, loaded with 7 live rounds of ammunition;

(14) a Glock, Model 17, 9 millimeter semiautomatic pistol, serial number defaced, loaded with 18 rounds of live ammunition; and

(15) a Colt, Model “Official Police,” .38 caliber revolver, serial number defaced, loaded with 6 rounds of live ammunition.

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$11,334.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

3. As a result of the violation(s) of Title 18, United States Code, Sections 922(g)(1) and 924(c), set forth in this indictment, defendant

**JOHN FELDER,
a/k/a “Bo,”**

shall forfeit to the United States of America all firearms and ammunition involved in the commission of such offense(s), including, but not limited to:

- (A) a Tanfoglio, Armi Guiseppe, Model GT- 27, .25 caliber

semiautomatic pistol, serial number M99572, loaded with 7 live rounds of ammunition;

(B) a Glock, Model 17, 9 millimeter semiautomatic pistol, serial number defaced, loaded with 18 rounds of live ammunition; and

(C) a Colt, Model “Official Police,” .38 caliber revolver, serial number defaced, loaded with 6 rounds of live ammunition.

All pursuant to Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY